

<b>UNITED STATES BANKRUPTCY COURT</b> <b>DISTRICT OF NEW JERSEY</b> <b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
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<p>In re:</p> <p><b>BLOCKFI INC., et al.,</b></p> <p style="text-align: center;">Debtors.<sup>1</sup></p>	<p>Chapter 11</p> <p>Case No. 22-19361 (MBK)</p> <p>Jointly Administered</p>

<sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

**NOTICE OF MOTION APPLICATION IN SUPPORT OF THE MOTION OF THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO (I) SEAL THE  
REDACTED PORTIONS OF THE STATEMENT OF THE OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS RESPECTING THE DEBTORS' AMENDED JOINT  
CHAPTER 11 PLAN AND (II) GRANTING RELATED RELIEF**

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**PLEASE TAKE NOTICE** that the Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the “**Debtors**,” the “**Company**,” or “**BlockFi**”), by and through its counsel, will move before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”) for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the Committee’s *Statement of the Official Committee of Unsecured Creditors Respecting the Debtors’ Amended Joint Chapter 11 Plan* (the “**Committee’s Statement**”), filed substantially contemporaneously herewith,<sup>2</sup> relating to the Committee’s *Emergency Motion of the Official Creditors Committee Requesting an Order Remediating the Debtors’ Improper Plan Solicitation in Violation of Bankruptcy Code Section 1125(b)* (the “**Committee’s Emergency 1125(b) Motion**”) in response to, among other things, the *Letter to Creditors in Support of Plan* filed by the Debtors on May 12, 2023 (the “**Debtors’ Plan Solicitation Letter**”) [Docket No. 873], and (B) granting the Committee such other and further

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<sup>2</sup> A redacted version of the Committee’s Statement has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the Committee’s Statement is being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey (uscourts.gov)).

relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal

**PLEASE TAKE FURTHER NOTICE** that, substantially contemporaneously with the filing of the Motion to Seal, the Committee has also filed an *Application for Order Shortening Time and Certain Other Relief* (the “**Scheduling Application**”) requesting that the hearing on the Motion to Seal be scheduled contemporaneously with the Committee’s Emergency 1125(b) Motion (for which an application requesting a hearing on shortened and limited notice was also filed) **at the Court’s earliest availability**.

**PLEASE TAKE FURTHER NOTICE** that objections, if any must be filed with the Clerk of the United States Bankruptcy Court, 50 Walnut Street, 3rd Floor, Courtroom 3A, Newark, New Jersey 07102, and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received in accordance with the Court’s order entered with respect to the Scheduling Application.

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: May 15, 2023

**GENOVA BURNS LLC**

By: /s/ Donald W. Clarke

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